## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

TERPSEHORE MARAS,	)
Plaintiff,	) Case No. 3:21-CV-00636
v.	) Judge Aleta A. Trauger
US DOMINION, INC., DOMINION	<i>)</i> )
VOTING SYSTEMS, INC., and	)
DOMINION VOTING SYSTEMS	)
CORPORATION,	)
	)
Defendants,	)

## DEFENDANTS' MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendants US

Dominion, Inc., Dominion Voting Systems, Inc, and Dominion Voting Systems

Corporation (collectively "Dominion") respectfully move the Court for an extension of time for Defendants to answer or otherwise respond to the Complaint in this case to

November 19, 2021.

- 1. The original Complaint in this action was filed on August 16, 2021, and Dominion was served with the Complaint on or about October 6, 2021.
- 2. Counsel for Dominion was retained on October 25, 2021, and is in the process of investigating the allegations against Dominion.

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- 3. In an effort to comply with Local Rule 7.01(a)(1), counsel for Dominion reached out to counsel for Maras via e-mail and by telephone immediately upon being retained to requested this extension. (**Exhibit A**). Counsel for Dominion has not yet received a response to the e-mail, and the telephone number reached a voicemail box that indicated it was full.
- 4. This request for extension is made in good faith, and is not made for the purposes of delay, obstruction, or any other improper purpose.
- 5. For the foregoing reasons, good cause exists under Rule 6(b) of the Federal Rules of Civil Procedure to grant the extension of time requested.

Based on the foregoing, Dominion respectfully requests that the Court grant Defendants until **November 19, 2021** in which to file a response to the Plaintiff's Complaint.

Respectfully submitted,

/s/ W. Scott Sims

W. Scott Sims (#17563)

D. Gil Schuette (30336)

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Attorneys for Defendants

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing was served on the following individuals via the Court's CM/ECF system on October 25, 2021:

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/s/ D. Gil Schuette

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